

Date: **February 29, 2008**

To: **Facility Mailing List for  
Eastman Chemical Company, Tennessee Operations**

From: **Eastman Chemical Company, Tennessee Operations (Eastman)**

Subject: Temporary Authorization

On February 29, 2008, Eastman submitted to the Tennessee Department of Environment and Conservation, Division of Solid Waste Management (DSWM) a request for temporary authorization in accordance with Rule 1200-1-11-.07(9)(c)5(v) to operate boilers 23 and 24 with the automatic waste feed cutoff (AWFCO) system inactive for a period not to exceed 150 hours in order to conduct an initial Comprehensive Performance Test (CPT) to demonstrate compliance with 40 CFR Part 63, Subpart EEE, commonly referred to as the Hazardous Waste Combustor MACT (HWC MACT).

Eastman operates boilers 23 and 24 for the production of steam in support of the manufacture of chemicals, fibers and plastics. Eastman also operates these boilers under Hazardous Waste Management Permit TNHW-131 for the treatment of biosludge from its industrial wastewater treatment plant and of liquid hazardous wastes. Under a plan approved by the Tennessee Division of Air Pollution Control (DAPC) on December 21, 2007, Eastman will conduct a CPT for boilers 23 and 24 in order to establish operating permit limits (OPL) for conditions that assure adequate hazardous waste treatment capacity while meeting applicable emission standards. The CPT will be conducted at worst-case operating conditions, including the treatment of hazardous waste. In order to achieve these operating conditions using actual waste streams, the AWFCO system must be inactive for the duration of the test, including when operating to reach steady-state operating conditions prior to stack emissions testing. Eastman is requesting temporary authorization to conduct the CPT with the AWFCO system inactive. The CPT is scheduled to be conducted in April 2008. Actual test dates will be determined based on operational conditions at the facility and the availability of results from each round of pretesting. Eastman will provide the applicable notifications of test dates as they are scheduled.

Approval of the temporary authorization will allow Eastman to conduct testing that will assure emission standards are met while generating steam to support manufacturing operations and providing adequate hazardous waste treatment capacity, thereby preventing the disruption of ongoing waste management activities. Assurance of adequate hazardous waste treatment capacity will contribute to the protection of human health and the environment by assuring on-site treatment of hazardous waste, thus eliminating the need to transport those hazardous wastes to off-site facilities. The wastes to be treated during the CPT are characteristic hazardous waste.

If you have questions concerning this request, please contact Keith Harris with Eastman at (423) 229-3926 or by mail at P. O. Box 511, B-54D-5<sup>th</sup> Floor, Kingsport, Tennessee, 37662.